

**UNITED STATES DISTRICT COURT  
DISCTRICK OF SOUTH CAROLINA  
COLUMBIA DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**RONALD WRIGHT,  
Defendant.**

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**DEFENDANT'S  
PROPOSED SUPPLEMENTAL  
VOIR DIRE**

**Docket No.: 3:18-078**

Comes now Defendant, by his attorney, Aimee J. Zmroczek, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure and respectfully requests that the Court ask these Voir Dire questions of the panel collectively in addition to the questions usually asked by the Court:

1. This is a criminal case. Each side - the government and Mr. Wright - are entitled to have a fair trial before an opened-minded jury. The process of selecting a jury is premised on finding a fair and impartial group of people to decide this case. In doing that, the Court will ask questions about you, your background, your experiences, and other areas of your life. The Court has the right and duty to find those individuals whose background, experience and responses guarantee the most impartial and unbiased jurors. When asked questions, should answer the questions completely and truthfully. We do not intend by these questions to pry into your personal affairs or to embarrass you in any way, but it is our duty to seek, and your duty to give, candid answers to all questions. If you have an answer to a question that you would be more comfortable giving here at the bench, you may raise your hand and do so.

2. The court will instruct you on the law. Of these legal instructions there are several specific instructions regarding criminal trials I would like to discuss.

They are:

a. That Mr. Wright is presumed to be innocent. Is there anyone on the panel who cannot presume the defendant as he sits here to be innocent of all the charges?

b. That the charge of a crime is not evidence of guilt. Is there anyone on the panel who believes that because Mr. Wright has been charged that he must have done something wrong or it is likely that he has done something wrong?

c. That the government must prove each element of charges beyond a reasonable doubt. Is there anyone who would require anything less of the Government the meeting the standard of proof beyond a reasonable doubt?

d. Is there any member of the panel who has any disagreement with the idea that Mr. Cannon has no burden of proof whatsoever, that the sole burden of proving his guilt is the government's and that if the government fails, you must find him not guilty.

e. Is there anyone on the panel who would hesitate to vote "not guilty" if the government failed to prove its case beyond a reasonable doubt?

3. The Assistant United States Attorney and the defense counsel attorneys are equals, both are lawyers, and thus equal in the eyes of the law, each doing his or her best to represent his or her client. Is there any member of the panel who would give any more weight to the arguments of the prosecutor than to the defense counsel merely because the prosecutor represents the government or because the prosecutor bears the title "Assistant United States Attorney?"

4. Do any of you believe that just because Mr. Wright is with someone else who is guilty of a crime that the Defendant is automatically guilty because of his association with that person?
5. Do any of you bank at Wells Fargo Bank?
6. Do you have an opinion as to the guilt or innocence of Mr. Wright as to any of the charges contained in the indictment at this time?
7. The law requires jurors to deliberate with other jurors in order to try to reach a unanimous verdict, do you understand that you have the right to stand by your beliefs in the case?
14. Is there any person on the jury panel who has a reason why they may not be a fair juror in this case which has not already been asked about?

WHEREFORE, defendant, Ronald Wright, requests the foregoing questions be posed to the jury panel and that the Court delve more fully into the possible bias or prejudice of any potential juror based on their answers to these questions.

Respectfully Submitted,

BY: /s/Aimee J. Zmroczek  
Aimee J. Zmroczek, #10767  
A.J.Z. Law Firm, LLC  
2003 Lincoln Street (29201)  
P.O. Box 11961  
Columbia, South Carolina 29211  
(t)803.403.7750 (f) 803.403.8005  
[aimee@ajzlawfirm.com](mailto:aimee@ajzlawfirm.com)  
Appointed Attorney for Defendant Wright

November 6, 2018.